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Attorneys for Defendant  
Bitmain Technologies, Ltd.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GOR GEVORKYAN, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

BITMAIN, INC., BITMAIN  
TECHNOLOGIES, LTD., and DOES 1 to 10,

Defendants,

Case No. 3:18-cv-07004-JD

**DECLARATION OF LUYAO LIU IN  
SUPPORT OF DEFENDANT BITMAIN  
TECHNOLOGIES, LTD.'S REPLY IN  
SUPPORT OF MOTION TO DISMISS  
FOR LACK OF PERSONAL  
JURISDICTION AND TO STRIKE  
CLASS ALLEGATIONS**

**[Reply in Support of Motion to Dismiss  
Filed Concurrently]**

Hearing Date: December 19, 2019  
Time: 10:00 a.m.  
Judge: Hon. James Donato

1 I, Luyao Liu, declare as follows:

2 1. I was the Investment Director of Defendant Bitmain Technologies, Ltd. and am  
3 currently the Chief Financial Officer. I am over the age of 18 and make this declaration of my  
4 own personal knowledge, and, if called as a witness, I could and would testify competently to the  
5 facts stated herein.

6 2. This declaration is made in support of Bitmain Technologies, Ltd.'s Reply in  
7 Support of Motion to Dismiss for Lack of Personal Jurisdiction and to Strike Class Allegations.

8 3. I have reviewed the Declaration of Christopher Marlborough (ECF No. 37-2) and  
9 the exhibits attached to it (ECF Nos. 37-3 – 37-14).

10 4. Bitmain, Inc. leases property located in San Jose, California. As I mentioned in  
11 my prior declaration (ECF No. 33-1 ¶ 7), Bitmain Technologies, Ltd. does not own, use, lease, or  
12 possess that property, or any other property in California.

13 5. Neither Bitmain Technologies, Ltd. nor Bitmain, Inc. operates any sales or service  
14 networks in California.

15 6. Bitmain Technologies, Ltd. has no employees who work in California.

16 7. Bitmain Technologies, Ltd. has never advertised or solicited anyone for  
17 employment at Bitmain, Inc.'s San Jose, California office. The entity referred to in Exhibit 2 to  
18 the Marlborough declaration (ECF No. 37-4), which Mr. Marlborough claims is a "job posting  
19 from Bitmain Technologies Limited" (ECF No. 37-2 ¶ 3), is not the defendant in this case but  
20 rather is Beijing Bitmain Technology Co., Ltd.—a separate entity that is incorporated and has its  
21 principal place of business in Beijing, China.

22 8. Peng Li is not and has never been an employee of Bitmain Technologies, Ltd. He  
23 is employed by Beijing Bitmain Technology Co., Ltd. and works in Beijing, China. When Peng  
24 Li travels to the United States for business, he often works at the property leased by Bitmain, Inc.  
25 in San Jose, California.

26 9. Sharif Allayarov, Andy Niu, Jane Hu, and Eric Wang are not and have never been  
27 employees of Bitmain Technologies, Ltd.  
28

10. Bitmain Technologies, Ltd. did not host a conference in California on August 31, 2019, nor has it hosted any other conferences in California. The August 31, 2019 conference referenced in the Declaration of Christopher Marlborough (ECF No. 37-2 ¶¶ 10–11, 13), and Exhibits 9, 10, and 13 to that declaration (ECF Nos. 37-11, 37-12, and 37-15), was hosted by Beijing Bitmain Technology Co., Ltd.

11. Bitmain Technologies, Ltd. does not operate a repair center in Fremont, California, or anywhere else in California. The Fremont repair center referred to in the Declaration of Christopher Marlborough (ECF No. 37-2 ¶ 9), and Exhibit 8 to that declaration (ECF No. 37-10), is outsourced by Shenzhen Century Cloud Core Technology Co., Ltd.

12. Bitmain Technologies, Ltd. does not operate the website Bitmain.com or the Facebook, Twitter, or YouTube pages referenced in the Declaration of Christopher Marlborough (ECF No. 37-2 ¶¶ 2, 4–5, 7, 9, 13), and Exhibits 1, 3, 4, 6, 8, and 12 attached to that declaration (ECF Nos. 37-3, 37-5, 37-6, 37-8, 37-10, 37-14). The referenced website and Facebook, Twitter, and YouTube pages are operated by Beijing Bitmain Technology Co., Ltd.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of November, 2019, at Beijing, China.

By: \_\_\_\_\_



Luyao Liu